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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Albert Russo CN 4853

Trenton, New Jersey 08650

(609) 587-6888

STANDING CHAPTER 13 TRUSTEE

In Re:

THOMAS J. BUBRYCKIE, JR

**Debtors** 

Case No: 15-21415 MBK

Chapter 13

Hearing Date: 10/23/18

Judge: Michael B. Kapla

## STANDING CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR(S) MODIFIED PLAN

The Standing Chapter 13 Trustee, Albert Russo, objects to the Debtors' Modified Plan for the following reasons:

1. The modified plan does not propose to pay the required threshold dividend to general unsecured creditors as determined by the originally confirmed plan.

WHEREFORE, the Standing Chapter 13 Trustee objects to Debtors' Modified Plan.

DATED: 10/16/18 By: /s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee By: David A. Martin, Staff Attorney